

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOSEPH LOCHRIDGE,

Plaintiff,

v.

CITY OF TACOMA, DEPARTMENT OF
TACOMA PUBLIC UTILITIES, TACOMA
RAIL, a municipal corporation,

Defendant.

Case No. 3:09-cv-05010-FDB

**STIPULATION AND ORDER
EXTENDING EXPERT DISCLOSURE
DEADLINES**

STIPULATION

The parties, through their undersigned counsel of record, hereby request the Court to extend the following deadlines by two weeks:

- Disclosure of Expert Witnesses and their reports from December 14, 2009 to December 28, 2009;
- Disclosure of Rebuttal Experts and their reports from January 11, 2010 to January 25, 2010; and

- Objections to Opposition's Experts from February 10, 2010 to February 22, 2010.

At the present time, the parties have exchanged Rule 26 Initial Disclosures and written discovery. The parties are diligently working to schedule the depositions of fact witnesses and plaintiff in order to meet upcoming deadlines, but are having difficulty doing so due to trial schedules, illnesses, and the Holidays.

The parties do not anticipate any adjustment to the trial date or other deadlines as a result of this extension.

The parties inform the Court that this is their second request for an extension of any deadlines in this case.

Wherefore, the parties request that the Court approve the Order extending the deadlines as set forth above.

**ROSSI COX VUCINOVICH
FLASKAMP PC**

DATED: December 2, 2009

By: s/Bahareh Samanian
Bahareh Samanian, WSBA #33165
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ATTORNEYS FOR PLAINTIFF

DATED: December 2, 2009

By: s/Margaret Elofson
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STIPULATION AND [PROPOSED] ORDER EXTENDING
EXPERT DISCLOSURE DEADLINES - Page 2

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4 **ORDER**

5 Based upon the foregoing Stipulation, IT IS HEREBY ORDERED that the following
6 deadline is extended:
7

- 8 ▪ Disclosure of Expert Witnesses and their reports is extended to 12/28/09;
9 ▪ Disclosure of Rebuttal Experts and their reports is extended to January 25, 2010;
10 and
11 ▪ Objection to Opposition's Experts is extended to February 22, 2010.
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13 Dated this 7th day of December, 2009.
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15 It is so ordered.

16 s/Pat LeFrois
17 Clerk for The Honorable Franklin D. Burgess
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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of December, 2009, I electronically filed the foregoing **STIPULATION AND [PROPOSED] ORDER EXTENDING EXPERT DISCLOSURE DEADLINES** with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following individual(s) listed below:

Margaret Elofson
Tacoma City Attorney - Civil Division
747 Market Street, Room 1120
Tacoma, WA 98402-3767

Dated: December 4, 2009

ROSSI COX VUCINOVICH FLASKAMP PC

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